

MORRIS POLICH & PURDY LLP  
David J. Vendler, Esq. (SBN 146528)  
Email: DVendler@mpplaw.com  
Kevin M. Pollack, Esq. (SBN 272786)  
Email: KPollack@mpplaw.com  
1055 West Seventh Street, Suite 2400  
Los Angeles, CA 90017  
Tel.: (213) 417-5100  
Fax: (213) 488-1178

Attorneys for Plaintiff CHRISTOPHER J. D'ANGELO  
and all others similarly situated

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

CHRISTOPHER J. D'ANGELO, an  
individual on behalf of himself and all  
others similarly situated,

Plaintiff,

vs.

VOLKSWAGEN GROUP OF  
AMERICA, INC.,

Defendant.

**CASE NO.: 2:15-cv-07390**

**DECLARATION IN SUPPORT OF  
VENUE**

1. I am an attorney duly licensed to practice in all courts in the State of California and I am a member in good standing of the U.S. District Court for the Central District of California. I am an associate in the firm of Morris Polich & Purdy LLP, counsel of record for Plaintiff Christopher D'Angelo in this pending action. The matters set forth in this declaration are within my personal knowledge and, if necessary, I could competently testify to each of them.

2. This declaration is being filed pursuant to California Civil Code § 1780.

3. Civil Code Section 1780 (c) provides that a plaintiff seeking to bring a claim under § 1780 (a) of the California Consumer Legal Remedies Act, such as in the above entitled action, may commence the action “in the county in which the person against it is brought resides, has his or her principal place of business, or is doing business, or in the county where the transaction or any substantial portion thereof occurred.”

4. Accordingly, venue is proper in this Judicial District because the vehicle purchased by Plaintiff that is at issue in this action was purchased at a Volkswagen authorized dealership located in Woodland Hills, CA, which is within this judicial district. Moreover, the defendant can be found in, have one or more agents in, and/or transact or has transacted business in this judicial district and division.

I declare under the penalty of perjury, pursuant to the laws of the United States of America, that the foregoing is true and correct that this declaration is executed on September 21, 2015 in Los Angeles, California.

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Kevin M. Pollack